Fact Sheet
June 2003

Update of Activities Romic Environmental Technologies Corporation

East Palo Alto, California

DTSC is one of six Boards and Departments within the California Environmental Protection Agency. The Department's mission is to restore, protect and enhance the environment, to ensure public health, environmental quality and economic vitality, by regulating hazardous waste, conducting and overseeing cleanups, and developing and promoting pollution prevention.

State of California

California Environmental Protection Agency

INTRODUCTION

We, the California Department of Toxic Substances Control (DTSC), have prepared this fact sheet to provide you information about upcoming activities which we oversee at Romic Environmental Technologies Corporation (Romic), located at 2081 Bay Road in East Palo Alto. We are currently evaluating a permit application that has been submitted by Romic. The permit directs how Romic must safely manage hazardous waste. Part of our evaluation includes preparing a Human Heath Risk Assessment and an Environmental Impact Report. This fact sheet will explain more about these documents and about how you can give us your input.

What's Inside:

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website at www.dtsc.ca.gov.

FACILITY DESCRIPTION

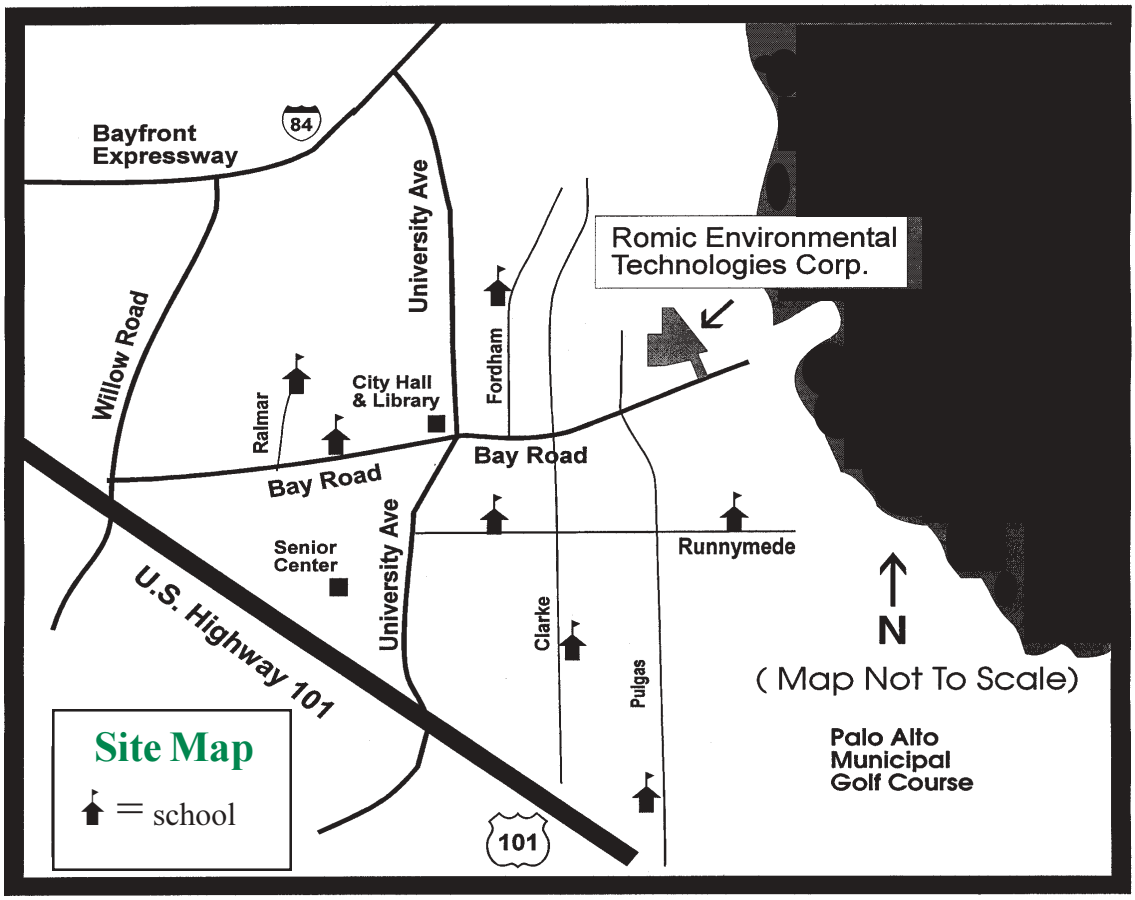
Romic is located in an industrial area of East Palo Alto, California. The 14-acre site is approximately one-half mile west of the San Francisco Bay and is bordered to the north and south by a tidal slough. Adjacent properties include auto dismantling yards, a Pacific Gas and Electric substation, and a property owned by Catalytica Corporation. Residences are about 2,000 feet to the west. An elementary school is approximately one-half mile away from Romic, and the Ravenswood Preserve to the east provides recreational opportunities for cyclist, hikers, and bird watchers.

Romic is a subsidiary of US Liquids Incorporated, a major waste handling corporation. Romic functions as a hazardous waste storage and treatment facility, and transports hazardous waste from its customers to the Romic East Palo Alto Facility. The facility may receive waste solvents, such as paint thinner or alcohol, antifreeze, wastewaters, and other hazardous wastes such as discarded paints and oils.

Processes used to treat solvents at Romic include distillation, thin film evaporation, fuel blending, wastewater treatment, lab packing, and liquefaction. Some products that are made from these processes can be shipped to cement manufactures to be burned in place of oil, natural gas, or coal for their processes.

Wastes are brought to the site in bulk tanker trucks, roll-off bins, 350-gallon totes, 5 to 30 gallon cans, or 55-gallon drums. Bulk waste is unloaded into storage tanks. Drums and other containers are placed in a storage area and are later transferred into tanks or shipped offsite.

Romic has been in operation at the East Palo Alto location since 1963. Prior owners have also used the site for recycling chemicals since 1956.



PROPOSED PERMIT RENEWAL

Romic has applied to DTSC for a renewal of its current Hazardous Waste Facility Permit for continued operations. A permit authorizes the use of hazardous waste management units, which are specialized equipment or specific areas used to handle hazardous waste. There are specific regulatory requirements for each type of unit based on its function and operation. The proposed Permit Renewal includes renewing all existing permitted units, adding existing units previously not permitted, adding new proposed units, increasing the total volume, and adding new types of wastes accepted by the facility.

Existing Permitted Units

The current permit authorizes the use of 50 storage tanks, 55 treatment units (tanks or other equipment used specifically for treatment) and four storage areas. Only 28 tanks of the originally approved 50 were built and in current use at the facility. The remaining 22 were never constructed. Similarly, of the 55 treatment units authorized, nine were never constructed. This proposed Permit Renewal will include all of the existing units that have been previously permitted: 28 storage tanks, two of which will be replaced, 46 process units, and four storage areas.

Existing Units not in Previous Permit

There are existing equipment and areas identified at the site which were not included in the original permit. These proposed hazardous waste management units include a drum sampling area, a truck parking area, loading and unloading areas, 46 storage tanks, and 18 treatment units.

There have been regulatory changes since the initial issuance of the permit which have necessitated certain equipment or areas to be reclassified as regulated units that require a permit. New requirements have been adopted for loading and unloading areas. These additional requirements impose limits on holding time and capacity amounts; and minimum secondary containment volumes. These areas will be addressed. Also, product storage tanks which were not previously required to be permitted are now included on the Proposed Permit Renewal as hazardous waste management units.

Additional New Units

Newly proposed units include treatment tanks that were previously permitted but never installed and other units that have not been permitted or built. Nine treatment tanks that were included in the previous permit are being proposed. Eleven new treatment units, which include a new consolidation booth, a debris shredder unit, a can crusher unit, a drum wash unit, an aerosol depressurization unit, and a truck wash unit, are being proposed for the first time in this permit.

Further additional units, which include 11 new storage tanks that will be located in Tank Farm E, Tank Farm Q and Tank Farm D, are also being proposed.

Table 1: current and proposed capacity

	Current Permitted Capacity	Proposed Permit Renewal Capacity
CONTAINER STORAGE Drums, Totes, Cans Roll-off bins	2,531 drums or up to 139,205 gal. as well as 68 cubic yards of solids	5,831 drums or up to 571,615 gal. as well as 320 cubic yards of solids
TANK STORAGE Tanks	50 tanks or up to 241,000 gal.	85 tanks or up to 603,547 gal.
TREATMENT UNITS	55 units or up to 154,512 gal/day	84 units or up to 154,512 gal/day as well as 85 tons/day of solids

HEALTH RISK ASSESSMENT

An HRA is used to evaluate the potential impacts on human health and the environment from the facility's routine operations and from certain possible accidental scenarios.

TOOLS WE USE TO EVALUATE A PROPOSED PERMIT

Some documents have been prepared to help us evaluate what the effect of permitting the facility would have on people's health or the environment. These documents are called a Heath Risk Assessment (HRA) and an Environmental Impact Report (EIR).

We use a four-step process to estimate the chance that contact with both cancer -causing chemicals and chemicals that aren't known to cause cancer from a site will harm people now or in the future. We calculate these risks based on if the facility is operating at the full proposed capacity. This process gives us numbers that show how great (or small) the risks may be. The results will provide DTSC with a sound scientific handle so that we can determine whether the potential health risk in and around the facility is significant or not. The HRA also points to who is at risk, what is causing the risk, and how sure we are about the numbers.

How We Do a Health Risk Assessment:

We study health risks based on what facilities do and are likely to do on the site. Our goal is to protect everyone who could come in contact with chemicals from the facility especially children, women of childbearing age, the elderly, and others who may be at greater risk. We use a four-part process to estimate the chance that contact with chemicals from a facility will harm people now or in the future. This process gives us numbers that show how great (or small) the risks may be. It also points to who is at risk, what is causing the risk, and how sure we are about the numbers.

Data Collection and Evaluation (Are toxic chemicals present? How much?): We find out what has happened at and around the facility, identify the chemicals that are used at or by the facility, and determine the amount of chemicals present.

Exposure Assessment (Will these chemicals get into my body?): We use the data collected in the first step to find out how much of each chemical people may be exposed to. People must come in contact with the chemicals to be at risk. The level of exposure depends a lot on how much of each chemical is there, who might be exposed, and how they are exposed. We would consider, for example, the potential for children to play around the facility and thus breathe in air emitted from the facility.

Toxicity Assessment (How toxic are these chemicals?): This is how we learn about which illnesses or other health effects may be caused by exposure to chemicals. It also says at what dose harmful health effects will occur. This is the same as saying how much of each chemical it takes to cause harm. The higher the dose and longer the duration of exposure, the more likely a chemical will cause harm.

Risk Characterization (Will chemicals at this facility do harm to me?): This final step of the process sums it all up. It reveals which chemicals are posing the risks and what the health risks are. It also says how sure we are about the results. Since some uncertainty about risk estimates is unavoidable, we build in a large margin of safety to prevent underestimation of the risks. These safeguards are intended to protect the exposed public.

DIFFERENCE BETWEEN AN HRA AND AN EIR

An HRA looks at the risks of being exposed to chemicals that are being used by a facility to people.

An EIR looks at how a facility will impact the surrounding environment in which it is located.

How We Review Permit Renewals

ENVIRONMENTAL IMPACT REPORT

Under the California Environmental Quality Act (CEQA), DTSC is responsible for reviewing the potential health and environmental risks from the Proposed Permit Renewal. The EIR details the project's significant environmental impacts, including direct, indirect, short and long term, and unavoidable effects. This document focuses on changes to the environment as it currently exists.

The examination of impacts is focused on changes in the affected areas as they exist. The following list on page 6 is a partial list of the environmental resources to be analyzed in the Romic EIR.

After the draft EIR is prepared, it will be available for public review and comment before it is finalized. A public meeting will be held to explain its findings, answer questions from the public, and receive comments for consideration prior to its becoming finalized. All public comments will receive a written response detailing how that comment was considered.

Title 22, Section 66271.7 of the California Code of Regulations requires that the facility renew their permit. The proposed permit would have a duration of ten years. DTSC reviews an application for a permit renewal through the following main steps:

1) DTSC reviews the permit application for technical completeness and compliance with applicable state and federal environmental regulations. If necessary, DTSC issues a Notice of Deficiency requiring additional information or changes to the existing information in the application. DTSC analyzes environmental impacts from the proposal.

2) DTSC prepares a draft permit renewal or permit denial based on whether the facility's application meets regulatory and technical standards.

3) DTSC solicits and receives comments from the public during a formal public comment period of at least 45 days. DTSC holds a public meeting and a public hearing, if requested, or if there is significant public interest.

4) After considering and responding to all comments, DTSC makes a decision to issue the permit, issue the permit with changes, or deny the permit.

SOME FACTORS THAT ARE ANALYZED IN AN EIR

Earth Resources

The EIR will provide a discussion of the existing topography, geological conditions, flood hazards, and impacts that may be associated with earth movement. Information on the soils both on the surface and below the surface will also be analyzed.

Air Quality

A discussion of the existing air quality and meteorological conditions in the East Palo Alto area will be provided in the EIR. The EIR will also analyze the emission levels from the proposed treatment/ storage units, and from mobile sources from the facility.

Land Use

The EIR will include a discussion of the existing land use and zoning in the East Palo Alto Ravenswood Industrial Area near the Romic Facility, including any foreseeable land use changes.

Risk of Upset

The risk of upset section of the EIR will analyze the potential impacts from natural events and human error. This could include the use and transport of materials and potential releases at the facility. A number of documents will be analyzed for this portion of the EIR such as: the compliance history, the accident history, the permit application, the facility business plan, and the city's General/Community Plan. Emergency response capabilities will be evaluated for the East Palo Alto area and will include a review of Romic's contingency plan, emergency response capabilities, the capabilities of the local fire departments and other emergency response agencies.

Human Health

The EIR will discuss the project's potential for causing adverse health impacts to the existing human population. The assessment of impacts will rely primarily on the Health Risk Assessment described on page 4 of this fact sheet. This will include a discussion of toxic air contaminants and their associated risks.

Transportation

The impacts of the Romic facility on traffic flow, road conditions and transport vehicles will be evaluated. Impacts will be determined based on the number of employees and the number of truck trips that are required to transport material to and from the facility. The analysis will consider both potential road hazards and the proximity to residential areas that can feasibly be bypassed by selecting alternative routes. The probability of a minor and a major accident and the potential impact from these accident scenarios will be estimated during the lifetime of the project. Air traffic will also be evaluated.

Noise

The impacts of the proposed project on noise levels will be examined. The general noise levels associated with different equipment will be evaluated and these will be compared to the allowable noise levels established by the City of East Palo Alto.

COMMUNITY CONCERNS IN THE EIR

Community outreach activities have been conducted between 1995 and 2002. From these activities, particular concerns were identified. In response to the community, the concerns listed below will be analyzed by the EIR.

Transportation issues: the transportation of hazardous waste through the community and evacuation procedures in case of an accident. This issue also includes safety as it relates to the facility's proximity to the Palo Alto Airport of Santa Clara County.

Health and Safety issues: the possibility of a fire and/ or an explosion as a result of Romic's handling of hazardous substances, and the possibility of an accidental release at the facility and the location of the facility near a residential area.

Environmental issues: The possible impacts of groundwater contamination, air emissions, odors and noise from the facility.

The community also voiced socio-economic concerns. Effects analyzed under CEQA must be related to physical changes. Economic and social effects are not considered environmental effects under CEQA.

WHERE TO FIND MORE INFORMATION

You may review the proposed Permit Renewal and other documents at the following information repositories:

San Mateo County Public Library
East Palo Alto Branch
2415 University Avenue
East Palo Alto, California 94303
(650) 321-7712 - call for hours of operation

Department of Toxic Substances Control
Berkeley Office
700 Heinz Avenue, Suite 200
Berkeley, California 94710
(510) 540-3800 - call for an appointment

You can also contact the following people for more information:

Evelia Rodriguez, Project Manager
(510) 540-3959 or Erodrigu@dtsc.ca.gov

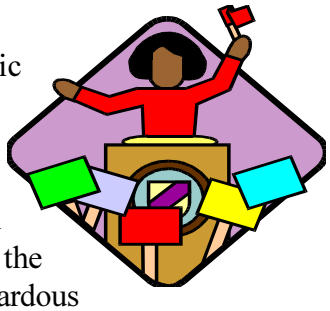
Lora Barrett, Public Participation Specialist
Toll free (866) 495-5651 or Lbarrett@dtsc.ca.gov

For media inquiries please contact:
Angela Blanchette, Public Information Officer
(510) 540-3732 or Ablanche@dtsc.ca.gov

Notice to Hearing Impaired Individuals:
TDD users can obtain additional information about the Romic site by using the California Relay Service (1-888-877-5378) to reach Lora Barrett at (866) 495-5651

HOW YOU CAN BECOME INVOLVED

We would like to hear your input.



Comment Periods
One key means of public involvement is submitting comments to DTSC during comment periods established at technical milestones, such as when the draft EIR and the draft hazardous waste permit are released. DTSC will keep the community informed of these comment periods by various means including direct mail and newspaper advertisements.

Public Meetings
DTSC will be holding a public workshop in August 2003 to present the findings of the Human Risk Assessment study. DTSC staff will be available to answer questions that members of the public may want to ask at that time.

Mailing List
If you did not receive this notice in the mail and would like to be put on the mailing list, please contact Lora Barrett by phone at (866) 495-5651 or by email at Lbarrett@dtsc.ca.gov or by mail at
Department of Toxic Substances Control
Attn: Lora Barrett
8800 Cal Center Drive
Sacramento, CA 95826

Public Participation Plan
DTSC has prepared a Public Participation Plan for this proposed project. The Public Participation Plan documents community concerns and describes the public participation activities to be conducted during the permitting and EIR process. A copy of the Public Participation Plan is available in the information repositories.